

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

PanAmSat Licensee Corp.

Application to Modify Authorization for
Galaxy 11 (S2253)

File No. SAT-MOD- _____

**APPLICATION OF PANAMSAT LICENSEE CORP.
TO MODIFY AUTHORIZATION FOR GALAXY 11**

PanAmSat Licensee Corp. (“PanAmSat”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“Commission” or “FCC”), 47 C.F.R. § 25.117, hereby seeks to modify the authorization for the Galaxy 11 satellite (call sign S2253). Specifically, this modification application seeks authority to relocate Galaxy 11 to, and to operate the satellite at, 304.5° E.L. (55.5° W.L.) in mid-2011.

In accordance with the requirements of the Commission’s rules,¹ this application has been filed electronically as an attachment to FCC Form 312. PanAmSat provides the technical information relating to the proposed modification on Schedule S and in narrative form, as contained in the attached Engineering Statement, pursuant to Section 25.114 of the Commission’s rules.²

I. PROPOSED MODIFICATION

By this modification application, PanAmSat requests authority to relocate Galaxy 11 to, and operate the satellite at, 304.5° E.L. (55.5° W.L.). Galaxy 11 currently is licensed to operate

¹ 47 C.F.R. § 25.117(c).

² 47 C.F.R. § 25.114.

at 32.80° E.L.,³ where it will be replaced by the New Dawn satellite (call sign S2751) in mid-2011.⁴ Once traffic transfer from Galaxy 11 to Intelsat New Dawn has been completed, and upon receipt of Commission approval, PanAmSat intends to relocate Galaxy 11 to 304.5° E.L. in late June 2011 and begin operating the satellite at that location in August 2011.

At 304.5° E.L., the Galaxy 11 will replace the Intelsat 705 satellite (call sign S2395), which is expected to operate temporarily at 304.6° E.L. (55.4° W.L.), subject to receipt of FCC approval.⁵ Intelsat anticipates de-orbiting the Intelsat 705 satellite from the 304.6° E.L. location.⁶ Galaxy 11 will also be located in the same station-keeping box as Intelsat 805 (call sign S2404), which is operated by Intelsat North America LLC – a sister company of PanAmSat.⁷

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00541, File No. SAT-MOD-20080225-00051 (July 25, 2008) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00574, File No. SAT-LOA-20080509-00101 (Jan. 16, 2009) (Public Notice).

⁵ See *Intelsat North America LLC Request for Special Temporary Authority to Drift Intelsat 705 to 304.6° E.L.*, File No. SAT-STA-20101006-00210 (filed Oct. 6, 2010); *Intelsat North America Request for Special Temporary Authority to Operate Intelsat 705 at 304.6° E.L.*, File No. SAT-STA-20101013-00216 (filed Oct. 13, 2010). Intelsat 705 is being relocated to 304.6° E.L. in order to satisfy customer demand for Ku-band capacity over Brazil prior to the relocation of Galaxy 11.

⁶ Intelsat 705's estimated end of maneuver life, assuming the drift to 304.6° E.L., is January 2012. The Commission previously approved the de-orbit plan for Intelsat 705. See *Intelsat North America LLC, Application to Modify Authorization for Intelsat 705 (S2395)*, File No. SAT-MOD-20100115-00010 (filed Jan. 15, 2010) (stamp granted with conditions Sept. 17, 2010).

⁷ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

II. PUBLIC INTEREST SHOWING

Grant of this modification will serve the public interest. At 304.5° E.L., Galaxy 11 will have sufficient power to operate a significant subset of its transponders through its design life, which is April 2015. Thus, grant of this modification application will enable PanAmSat to provide customers an additional four to five years of service following the planned de-orbit of Intelsat 705. Moreover, approval of this proposed deployment plan will ensure that there are no service interruptions for customers on that satellite. Overall, the proposed co-location of Galaxy 11 and Intelsat 805 will best meet the capacity needs of customers in this region.

Moreover, grant of this modification application will not result in increased risk of harmful interference. The 304.5° E.L. orbital location has been assigned to Intelsat,⁸ and PanAmSat will operate Galaxy 11 at 304.5° E.L. in accordance with Intelsat's existing coordination agreements and the FCC's rules governing operations at that location vis-à-vis adjacent locations. PanAmSat notes that Galaxy 11 contains the bands 13.75-14.00 GHz and 11.95-12.2 GHz, which are not currently licensed on Intelsat 805, and which will not be authorized on Intelsat 705 at 304.6° E.L. because they are not on the satellite.

III. TECHNICAL WAIVERS

As described in the attached Engineering Statement, PanAmSat requests waiver, to the extent necessary, of the following technical rules: (1) Section 25.114(d)(3) of the Commission's rules, which requires submission of the coverage map of the satellite's beam pattern in a certain format; and (2) Sections 25.114(d)(14)(ii) and 25.283(c) of the Commission's rules, which require that spacecraft are able to vent all pressurized systems at end of life. Under Section 1.3

⁸ See *Applications of Intelsat LLC for Authority to Operate and to Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460 (2000) (Memorandum Opinion Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."⁹ Good cause exists if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than adherence to the general rule.¹⁰ In determining whether waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."¹¹ As shown below, there is good cause for all of the requested waivers.

A. Request for Waiver of Section 25.114(d)(3)

To the extent necessary,¹² PanAmSat requests a waiver of Section 25.114(d)(3), which requires that the space station antenna gain contour(s) for each transmit and receive antenna beam be plotted on an area map at 2 dB intervals down to 10 dB below peak value of the parameter and at 5 dB intervals between 10 dB and 20 dB below peak values. As explained more fully on pages 1 through 3 of the attached Engineering Statement, PanAmSat requests a waiver of Section 25.114(d)(3) with respect to Galaxy 11's TT&C bicone and pipe antenna beams (Exhibits 2R, 2S, 2U and 2V in the Engineering Statement), as well as with respect to its ULPC global horn antenna (Exhibits 2X and 2Y in the Engineering Statement). The satellite

⁹ 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹⁰ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹¹ *WAIT Radio*, 418 F.2d at 1159.

¹² The Commission has not required a specific waiver of Section 25.114(d)(3) when presented previously with information similar to that which is contained in PanAmSat's Engineering Statement. *See, e.g., Application For Modification of Authority to Launch and Operate Intelsat 11*, File No. SAT-MOD-20070207-00027 (filed Feb. 2, 2007); *Policy Branch Info. Actions Taken*, Public Notice, 22 FCC Rcd 17,776, 17,776 (2007) (granting, with conditions, modification authority for the IS-11); *Application for Authority to Launch and Operate a Replacement Satellites at 123° W.L.*, File No. SAT-RPL-20070222-00035 (filed Feb. 22, 2007); *Policy Branch Info. Actions Taken*, Public Notice, 22 FCC Rcd 18,930, 18,930 (2007) (granting operational authority for Galaxy 18 at 123° W.L.).

manufacturer does not provide the beam patterns in the required form. PanAmSat provides a descriptive characterization of these beams on pages 1 through 3 of the Engineering Statement. To the extent necessary, there is good cause to waive Section 25.114(d)(3) because in this case PanAmSat's descriptive characterization, coupled with the beam patterns provided by the manufacturer, fulfill the informational requirements of Section 25.114(d)(3). In addition, granting the requested waiver would be consistent with precedent. The FCC has previously waived Section 25.114(d)(3) in similar circumstances.¹³

B. Request for Waiver of Sections 25.114(d)(14)(ii) and 25.283(c)

Additionally, PanAmSat requests a waiver of Sections 25.114(d)(14)(ii) and 25.283(c) of the Commission's rules. These rules require an applicant to demonstrate that all stored energy will be vented at the spacecraft's end of life.¹⁴ Galaxy 11 is a Boeing model 702 spacecraft that is not designed to vent all pressurized systems. Instead, the pressurant for the Galaxy 11 satellite that was used during orbit raising was permanently isolated from the propulsion system by firing a pyrotechnic valve at beginning of on-orbit life such that the residual gas (about 5%) cannot be vented at end of life.

Waiver is appropriate in this case because grant would not undermine the purpose of these rules, which is to reduce the risk of accidental explosion and post de-orbit debris. As explained on pages 6 and 7 of the attached Engineering Statement, PanAmSat will ensure that all active units on the Galaxy 11 satellite are turned off and that all propellant tanks are depleted. In addition, the satellite's manufacturer, Boeing, has designed the Galaxy 11 spacecraft so that risk

¹³ See *Intelsat North America LLC Application for Authority to Launch and Operate Intelsat 15, a Ku-band Replacement Satellite at 85.15° E.L.*, File No. SAT-LOA-20090410-00043 and SAT-AMD-20090528-00059 (stamp grant with conditions Nov. 25, 2009).

¹⁴ 47 C.F.R. §§ 25.114(d)(14)(ii) & 25.283(c).

of accidental explosion causing additional orbital debris is minimal. First, the risk of accidental explosions is minimized because the pressures will be very low at end of life of the satellite, especially after the spacecraft is powered down and the temperature in the tanks drops. Additionally, Boeing has designed the tanks so that they leak before they burst. If a leak were to occur, there would not be sufficient energy in the gas stream to damage structurally the spacecraft and generate debris. Moreover, a leak would not significantly perturb the satellite's orbit because the expulsion of the pressurant gas would cause the spacecraft to tumble and the change in the spacecraft's velocity (*i.e.*, the thrust) would be randomly distributed, with the resulting impact on the satellite orbit's apogee and perigee being very small.

Grant of the waiver is also supported on hardship grounds.¹⁵ The pressurant tank on the Galaxy 11 satellite was permanently sealed off following the completion of launch transfer orbit via a pyro valve, and consequently cannot be vented at the satellite's end-of-life. Galaxy 11 is an in-orbit spacecraft. As such, a design change cannot be accomplished at this time. Avoiding such hardship is particularly appropriate where, as here, the licensee acted in good faith. Specifically, the Galaxy 11 satellite was licensed, launched, and operational prior to adoption of the rule requiring discharge of remaining fuel at end-of-life.¹⁶ Under these circumstances, good cause exists to waive Sections 25.114(d)(14)(ii) and 25.283(c).

¹⁵ The FCC has previously waived Section 25.283(c) of its rules when modification of a satellite would present an undue hardship given the late stage of satellite construction. *See, e.g., Modification to Relocate Horizons 2 from 74.0 to 74.05 W.L.*, File No. SAT-MOD-20070628-00090 (grant stamp with conditions Nov. 30, 2007).

¹⁶ The Commission originally granted PanAmSat authority to launch the Galaxy 11 satellite on February 25, 2000. *See PanAmSat Licensee Corp.; Application for Authority to Launch and Operate a Hybrid Replacement Fixed Satellite Serv. Space Station*, Order and Authorization, 15 FCC Rcd 22,156 (2000). The Galaxy 11 satellite in fact was launched and began operations prior to the grant of this Order, operating under Special Temporary Authority granted in 1999. *See PanAmSat Licensee Corporation's Request for Special Temporary Authority for In-Orbit Testing of the Galaxy XI Satellite*, File No. SAT-STA-19990929-00095 (granted Dec. 21, 1999).

IV. OPERATIONAL FREQUENCIES

The following chart shows the frequencies that will be used by the Galaxy 11 satellite at 304.5° E.L., the frequencies that are currently used by the Intelsat 805 satellite at 304.5° E.L., and the frequencies that will be operated by the Intelsat 705 at 304.6° E.L.¹⁷

Frequency Range	Galaxy 11	Intelsat 805	Intelsat 705
3420-3625 MHz		X	
3625-3700 MHz		X	
3700-4200 MHz	X	X	X
5850-5925 MHz		X	
5925-6425 MHz	X	X	X
6425-6650 MHz		X	
10950-11200 MHz	X		X
11450-11700 MHz			X
11700-11950 MHz	X		X
11950-12200 MHz	X		
12500-12750 MHz		X	
13750-14000 MHz	X		
14000-14250 MHz	X	X	X
14250-14500 MHz	X		X

The Commission's orbital debris mitigation rule requiring discharge of all propellant, Section 25.283(c), was adopted in an order released June 21, 2004, *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004), that became effective October 12, 2004. *Mitigation of Orbital Debris*, 69 Fed. Reg. 54581-54589 (Sept. 9, 2004).

¹⁷ Although Intelsat 705 also has the bands 12.5-12.75 GHz, Intelsat does not plan to use these frequencies on Intelsat 705 at 304.6° E.L.

This chart shows that, with the exception of the band 11450-11700 GHz, the replacement of the Intelsat 705 satellite by the Galaxy 11 satellite will not leave any frequencies vacant at the nominal 304.5° E.L. orbital location. The Galaxy 11 satellite will use the 13750-14000 MHz and 11950-12200 MHz frequency bands, which have not previously been authorized for use by PanAmSat at this orbital location and are not part of the pending Intelsat 705 application. In addition, the Galaxy 11 satellite will operate in the 10950-11200 MHz, 11700-11950 MHz, and 14250-14500 MHz frequency bands, which are not on the Intelsat 805 satellite but are part of the pending Intelsat 705 application.

V. REQUEST FOR GRANT WITHOUT MILESTONES OR A BOND

The International Bureau should grant this application without imposing milestones¹⁸ or a bond.¹⁹ Because Galaxy 11 already is in-orbit and operating, all milestones for this satellite have been satisfied and PanAmSat is not required to post a bond.²⁰ Indeed, the Commission has granted similar applications for in-orbit satellites without imposing milestones or a bond.²¹

¹⁸ 47 C.F.R. § 25.164(a).

¹⁹ 47 C.F.R. § 25.165.

²⁰ See *Loral Skynet Network Services, Inc.*, 21 FCC Rcd 14,365 (Int'l Bur. 2006) (“Because Telstar 18 is in-orbit and operating, Loral is not required to post a bond.”).

²¹ See *Application of PanAmSat Licensee Corp. to Modify Authorization for Galaxy 11*, File No. SAT-MOD-20080225-00051 (stamp grant Jul. 22, 2008) (granting authority to operate in new frequencies at 32.80° E.L. without imposition of a bond); *PanAmSat Licensee Corp., Application to Modify Authorization to Relocate Intelsat 5 to 169.0° E.L.*, File No. SAT-MOD-20080725-00150 (stamp grant Oct. 17, 2008) (granting authority to operate in new frequencies at 169.0° E.L. without imposition of a bond); *PanAmSat Licensee Corp., Application to Modify Authorization for Intelsat 1R (S2368)*, File No. SAT-MOD-20090720-00073 (stamp grant Aug. 5, 2010) (granting authority to operate in new frequencies at 50.0° W.L. without imposition of a bond).

VI. PANAMSAT ACCEPTS SECTION 316 PETITION CONDITIONS

PanAmSat understands and accepts that its license to operate Galaxy 11 at 304.5° E.L., with the exception of the 13.75-14.00 GHz and 11.95-12.2 GHz band frequencies, will be conditioned as follows:

- (a) Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization (“ITSO”) that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
- (b) No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.²²

VII. ITU COST RECOVERY

PanAmSat is aware that processing fees are currently charged by the ITU for satellite filings, and that Commission applicants are responsible for any and all fees charged by the ITU. PanAmSat is aware of and unconditionally accepts this requirement and responsibility to pay any ITU cost recovery fees associated with the ITU filings that the Commission makes on behalf of PanAmSat for use of extended Ku-band frequencies at the 304.5° E.L. orbital location, as well as any ITU filings associated with any satellite system for which PanAmSat may request authorization at a later date.

VIII. 10.95-11.20 GHZ AND 13.75-14.00 GHZ FREQUENCY BANDS

PanAmSat understands that operations in the 10.95-11.20 GHz and 13.75-14.00 GHz frequency bands are subject to certain limitations and obligations, which PanAmSat accepts and

²² See *Petition of the Int’l. Telecomms. Satellite Org. under Section 316 of the Commc’ns Act*, as amended, IB 06-137, File No. SAT-MS-20060710-00076, Order of Modification, 23 FCC Rcd 2764, 2769-71 (¶¶11-13)(Int’l Bur. 2008).

will fulfill. Specifically, for operations in the 10.95-11.20 GHz frequency band, PanAmSat accepts the following conditions:

- Operations in the 10.95-11.2 GHz frequency band shall comply with the terms of footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference.
- Operations in the 10.95-11.2 GHz frequency band are limited to international operations in accordance with footnote NG 104 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

For operations in the 13.75-14.00 GHz frequency bands, PanAmSat accepts the following conditions:

- In the 13750-14000 MHz band (Earth-to-space), receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations.
- Pursuant to footnote US337 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US337, any earth station in the United States and its possessions communicating with the Galaxy 11 space station in the 13750-14000 MHz band (Earth-to-space) is required to coordinate through National Telecommunications and Information Administration's (NTIA's) Interdepartment Radio Advisory Committee's (IRAC's) Frequency Assignment Subcommittee (FAS) to minimize interference to the National Aeronautics and Space Administration Tracking and Data Relay Satellite System, including manned space flight.
- Operations of any earth station in the United States and its possessions communicating with the Galaxy 11 space station in the 13750-14000 MHz band (Earth-to-space) shall comply with footnote US356 to United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US356, which specifies a mandatory minimum antenna diameter of 4.5 meters and a non-mandatory minimum and maximum equivalent isotropically radiated powers (e.i.r.p.). Operations of any earth station located outside the United States and its possessions communicating with the Galaxy 11 space station in the 13750-14000 MHz band (Earth-to-space) shall be consistent with footnote 5.502 to the ITU Radio Regulations, which allows a minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network and specifies mandatory power limits.

- Operators of earth stations accessing the Galaxy 11 space station in the 13750-14000 MHz band are encouraged to cooperate voluntarily with the National Aeronautics and Space Administration (NASA) in order to facilitate continued operation of NASA's Tropical Rainfall Measuring Mission (TRMM) satellite.

IX. CONCLUSION

For the reasons set forth above, PanAmSat respectfully requests that the Commission grant this modification application.

Respectfully submitted,

PanAmSat Licensee Corp.

By: /s/ Susan H. Crandall

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Exhibit A
FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved the foreign ownership in PanAmSat Licensee Corp. See *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007) (“*Intelsat-Serafina Order*”). In December 2009, the Commission also approved certain pro forma changes in PanAmSat’s foreign ownership. There have been no other material changes to the foreign ownership since the date of the *Intelsat-Serafina Order*.

Exhibit B
FCC Form 312, Response to Question 36: Cancelled Authorizations

PanAmSat Licensee Corp. has never had an FCC license “revoked.”

However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to PanAmSat Licensee Corp. based on the Bureau’s finding that PanAmSat Licensee Corp. had not satisfied applicable construction milestones. *See PanAmSat Licensee Corp., Memorandum Opinion and Order, DA 00-1266, 15 FCC Rcd 18720 (IB 2000).* In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat Licensee Corp. filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed in January 2003 at PanAmSat Licensee Corp.’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by question 36, PanAmSat Licensee Corp. is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat Licensee Corp. does not reflect on PanAmSat Licensee Corp.’s basic qualifications, which are well-established and a matter of public record.

Exhibit C
FCC Form 312, Response to Question 40:
Officers, Directors, and Ten Percent or Greater Shareholders

Following are the officers of PanAmSat Licensee Corp.:

Steve Spengler, Chairman of the Board, President & Chief Operating Officer
Patricia Casey, Senior Vice President, General Counsel & Secretary
Anita Beier, Senior Vice President & Controller
Hank Courson, Vice President & Treasurer

Following are the directors of PanAmSat Licensee Corp.:

Steve Spengler
Patricia Casey
Anita Beier

The address of all PanAmSat Licensee Corp. officers and directors is:

4 rue Albert Borschette
L-1246 Luxembourg

PanAmSat Licensee Corp., a Delaware corporation, is wholly owned by Intelsat International Systems LLC (formerly known as PanAmSat International Systems LLC), a Delaware limited liability company. Intelsat International Systems LLC is wholly owned by Intelsat Corporation (formerly known as PanAmSat Corporation). Intelsat Corporation holds 59% of Intelsat International Systems LLC directly and 41% indirectly. (Specifically, Intelsat Corporation wholly owns 100% of PanAmSat International Holdings LLC, which wholly owns USHI, LLC, which in turn holds a direct, 41% interest in Intelsat International Systems LLC.) Intelsat Corporation is a wholly-owned subsidiary of Intelsat Holding Corporation, a Delaware corporation. Intelsat Holding Corporation is a wholly-owned subsidiary of Intelsat Luxembourg Finance Company Sarl, a Luxembourg company. Intelsat Luxembourg Finance Company Sarl is a wholly-owned subsidiary of Intelsat (Gibraltar) Limited, a Gibraltar company. Intelsat (Gibraltar) Limited is a wholly-owned subsidiary of Intelsat Jackson Holdings S.A., a Luxembourg company. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat (Luxembourg) S.A., a Luxembourg company. Intelsat (Luxembourg) S.A. is wholly owned by Intelsat S.A., a Luxembourg company. Intelsat S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Global Subsidiary S.A., a Luxembourg company. Intelsat Global Subsidiary S.A. is wholly owned by Intelsat Global S.A., a Luxembourg company (“Intelsat Global”, formerly “Serafina Holdings Limited”). Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat Global’s ownership was approved by the Commission in the *Intelsat-Serafina Order*, has not changed materially and is incorporated by reference. See *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007) (“*Intelsat-Serafina Order*”).